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March 22, 2012

Received & Inspected

MAR 25 2012

FCC Mail Room

The Honorable Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

RE: WC Docket No. 12-62 and Comp. Pol. File No. 1030

To Whom It May Concern:

I am writing to object to the application of MCI Communications Services, Inc. and Telecom*USA, Inc. to discontinue domestic telecommunications services.

I have been using prepaid phone cards since 2004. I have cards from MCI, Verizon, and Sprint. The cards are portable and useable with any phone at any location. They do not depend on an internet access. Nor are they restricted to use in a wireless environment. The rate per minute is very economical. There are no complicated rules; all the information needed to successfully use and refill the cards is located on the back of each card. These phone cards are highly efficient for the user. I carry one with me at all times. I keep one by the land line in my residence. The cards can be used for domestic and international calls, and can be used at pay phones. This is all covered on the back of each card. An access number is assigned to each card and is needed to access the stored minutes.

MCI Communications Services and Telecom*USA, Inc. are reported in the Public Notice published by the Federal Communications Commission as asserting that "multiple alternative products are available and that the public convenience and necessity will not be impaired by the proposed discontinuance because" other companies offer products.

I checked the "alternative products" for the companies mentioned in the public notice. Not one of the companies offers a comparable product.

Black Hawk offers prepaid wireless handsets. The handsets are evidently sold at grocery and drug chains. But there is no guide or information as to where these chains operate. A wireless handset is far less convenient and far less versatile than a simple card that can be stored in a wallet. I have never seen a Black Hawk product in the grocery and drug chains in this area of Central Pennsylvania.

Coinstar according to the company website provides gift cards. There is no evidence of prepaid phone cards being available. MCI and Telecom*USA are being disingenuous by declaring Coinstar as an

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alternate source for phone cards.

InComm offers wireless only. Wireless is not a reasonable alternative for citizens who do not own a wireless phone. Nor is wireless as reliable during a serious regional or national emergency when cell service is cut. I do not own a wireless phone. I continue a land line service at my residence. I don't plan to own a wireless phone. So the InComm "alternative" would be inconvenient and not serve my more simple necessity.

IDT according to their website assumes an internet connection available at the point of use of the prepaid product they are marketing. The website offers a prepaid low price per minute, but then in later description describes a connection fee for every call, a monthly fee for the card, and the fees and rates are subject to change without notice. IDT emphasizes international phone card use. This IDT product is clearly not an alternative to the existing prepaid phone cards that MCI and Telecom*USA, Inc. seek to discontinue. There are no monthly or connection fees attached to the current MCI and Telecom*USA product.

AT&T has virtual cards which they say are designed for economical state to state calls. In-state rates are higher; the actual charge is not defined on the website. Information about rates is available only to card holders. AT&T cost conscious users would be required to have a computer to learn calling rates before placing a call. AT&T offers online recharge and website delivery of pin and toll-free access numbers, requiring an AT&T card user to have a computer. This is not an alternative to the existing prepaid phone cards that are marked for discontinuance. The AT&T cards are obviously not convenient and do not meet the necessity of quick painless use of any phone without additional intervention of technology. The AT&T card would not meet my convenience and necessity because I make almost no state to state calls; I use the prepaid card for all calls except local. I subscribe to local service only on my land line account. The current prepaid cards are convenient, easily refillable; there is a surcharge and tax connected with the refill. The cards are highly economical, versatile, and workable in any kind of environment.

I recall that during the flood in New Orleans the rescue workers carried prepaid phone cards so that they would be able to communicate with their families and with other relief workers without the requirement of any other piece of equipment. The companies listed above and in the Public Notice are making so-called prepaid phone service available through another device. The current prepaid card is simply a card with access information on it. Adding a device does not provide an alternative comparable product to the simple card that is useful and usable in any phone environment.

In addition to the comments above I have discovered that Verizon, the name on the prepaid phone card I am using currently is not staffing its refill lines as it should be to accommodate the evident surge of refill of minutes requests. I made repeated calls with little success in adding minutes to my card just a few days ago. The problems were disparate and included no answer and a continuously ringing phone with no pick up during the refill process. The automated phone system did not bring an operator on the line when it said it would. I did not receive the same automated phone system with the same instructions with each attempt I made to refill the card.

I waited until the middle of the night and then had success in adding minutes.

I request that the application of MCI Communications Services, Inc. and Telecom*USA, Inc. to discontinue domestic telecommunications services WCDocket No. 12-62 be denied.

Members of the public using the current prepaid phone cards will not be well served by the discontinuance. There clearly are no alternate convenient economical cards or reasonable substitutes available for domestic prepaid phone access that is highly portable and accommodates simple land line access.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda K. Rambler".

(Dr.) Linda K. Rambler

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